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Northern District of California
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Counsel for Defendant MORGAN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL MORGAN,

Defendant.

Case No.: 4:23–MJ-71424 MAG

**STIPULATION AND ORDER TO
CONTINUE STATUS HEARING TO
NOVEMBER 30, 2023 AND TO
EXCLUDE TIME**

Hearing Date: October 24, 2023
Hearing Time: 10:30 a.m.

The above-captioned matter is set on October 24, 2023, at 10:30 a.m. for a status regarding preliminary hearing and arraignment. The parties jointly request that the Court continue this matter to November 30, 2023, and that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) until November 30, 2023.

Mr. Morgan is charged with mail theft and theft of mail keys. The government produced the first batch of discovery in this case in on September 26, 2023, which involves 22 video files along with reports and photographs. Due to a processing error, that discovery was not viewable by defense counsel until October 16, 2023. Defense counsel therefore needs additional time to review that discovery with Mr. Morgan (who lives out of District). Defense counsel also needs additional time

1 for pre-indictment negotiations with the government.

2 The parties stipulate and agree that the ends of justice served by this continuance outweigh the
 3 best interest of the public and the defendant in a speedy trial. The parties agree also that the failure to
 4 grant this continuance would deny counsel for Mr. Morgan the reasonable time necessary for
 5 effective preparation, taking into account the exercise of due diligence. Accordingly, the parties agree
 6 that the period of time between October 24, 2023, through November 30, 2023, should be excluded in
 7 accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for
 8 effective preparation of defense counsel, taking into account the exercise of due diligence.

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 10
 11 Dated: October 16, 2023

Respectfully submitted,

12 JODI LINKER
 13 Federal Public Defender
 Northern District of California

14 /S/

15 SAMANTHA JAFFE
 Assistant Federal Public Defender

16
 17
 18 Dated: October 16, 2023

19 ISMAIL J. RAMSEY
 United States Attorney
 Northern District of California

21 /S/

22 EVAN MATEER
 Assistant United States Attorney

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 MICHAEL MORGAN,
16 Defendant.
17

Case No.: 4:23-MJ-71424 MAG
**ORDER TO CONTINUE STATUS
HEARING**

18 Based on the agreement of the parties in the stipulation above, the status hearing regarding
19 preliminary hearing and arraignment presently set for October 24, 2023, at 10:30 a.m., is vacated.
20 This matter is reset to November 30, 2023, at 10:30 a.m.
21

22 IT IS SO ORDERED.
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24 Dated: October 16, 2023
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27 HON. DONNA M. RYU
28 Chief Magistrate Judge